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*Counsel for Telegraph Marketplace Partners II, LLC*

**UNITED STATES BANKRUPTCY  
COURT DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-13359 (VFP)

(Joint Administration Requested)

**APPLICATION FOR *PRO HAC VICE* ADMISSION OF DARREN NEILSON**

Creditor and landlord Telegraph Marketplace Partners II, LLC, a Utah limited liability company (“**Telegraph Partners**”), by and through its undersigned co-counsel, Graff Silverstein LLP, makes this application (the “**Application**”), for *pro hac vice* admission of Darren Neilson, Esq. and represents as follows:

1. On April 23, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States

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<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

Code, as amended the (“**Chapter 11 Cases**”) in the United States Bankruptcy Court for the District of New Jersey.

2. Mr. Neilson is a partner of the firm Parsons Behle and Latimer, which maintains offices at, among other places, 201 S Main St #1800, Salt Lake City, UT 84111. Because of his familiarity with the facts, circumstances, and legal skills relevant to the Debtors in the within matter, Telegraph Partners requests that Mr. Neilson be allowed to appear *pro hac vice* for the purposes of representing Telegraph Partners in connection with the Chapter 11 Cases.

3. As set forth in the accompanying Declaration of Darren Neilson, annexed hereto as **Exhibit A**, Mr. Neilson is a member in good standing of the United States District Court, Central District of Utah, United States District Court, Central District of California, and United States District Court, Northern District of California. Mr. Neilson is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Neilson has represented that he will adhere the disciplinary jurisdiction of this Court. Mr. Huebner also has represented that he will arrange with the New Jersey Lawyer’s Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Darren Neilson *pro hac vice* in the above-captioned matter.

Dated: May 11, 2023

Respectfully submitted,  
/s/ David Graff

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**Counsel to Telegraph**  
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# **EXHIBIT A**

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**UNITED STATES BANKRUPTCY  
COURT DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.<sup>2</sup>

Chapter 11

Case No. 23-13359 (VFP)

(Joint Administration Requested)

**DECLARATION OF DARREN NEILSON, IN SUPPORT OF APPLICATION FOR *PRO HAC VICE* ADMISSION OF DARREN NEILSON**

DARREN NEILSON, of full age, hereby certifies as follows:

1. I am an attorney-at-law and a partner of the law firm of Parsons Behle and Latimer, which maintains offices at, among other places, 201 S Main St #1800, Salt Lake City, UT 84111. Because of my expertise in bankruptcy and my familiarity with the facts and circumstances relevant to the above captioned pending matter, Telegraph Market Partners, II (“**Telegraph Partners**”), a landlord and creditor of the debtors in the above captioned cases (the “**Debtors**”), request that I be allowed to appear *pro hac vice* for the purpose of representing

<sup>2</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

Telegraph Partners in connection with the above-captioned bankruptcy case. I submit this Certification in support of the application for my admission *pro hac vice*.

2. I certify that I am eligible for admissions to this Court, am admitted, practicing and in good standing as a member of the United States District Court, Central District of Utah, United States District Court, Central District of California, and United States District Court, Northern District of California. I am in good standing before the courts in which I am admitted, and I have not been disbarred, suspended, or disciplined by any court or administrative body.

3. If the Application is granted, I agree to abide by this Court's local rules, to submit myself to the disciplinary jurisdiction of this Court, and to make payment to the New Jersey Lawyer's Fund for Client Protection as provided in New Jersey Court Rule 1:28-2(a) and to the District Court under L. Civ. R. 101.1(c)(3).

4. For the foregoing reasons, I respectfully request my application for admission *pro hac vice* be granted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 11, 2023

/s/ Darren Neilson  
Darren Neilson